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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DITECH FINANCIAL LLC f/k/a GREEN TREE  
SERVICING LLC,

Plaintiff,

vs.

DORADO HOMEOWNERS ASSOCIATION;  
LAS VEGAS DEVELOPMENT GROUP, LLC;  
THUNDER PROPERTIES, INC.; and NEVADA  
ASSOCIATION SERVICES, INC.,

Defendants.

Case No.: 3:16-cv-00351-MMD-CBC

**STIPULATION REGARDING  
DISPOSITIVE MOTION DEADLINE  
GIVEN BANKRUPTCY COURT'S  
IMPOSITION OF AUTOMATIC STAY**

Plaintiff Ditech Financial LLC f/k/a Green Tree Servicing LLC (**Ditech**) and Defendants Las Vegas Development Group, LLC (**LVDG**), and Thunder Properties, Inc. (**Thunder**) (collectively, the **Parties**)<sup>1</sup> by and through their respective counsel of record, stipulate as follows:

1. This lawsuit involves quiet title/declaratory relief and other claims related to a non-judicial homeowner's association foreclosure sale conducted pursuant to NRS 116.
2. On March 6, 2019, Ditech filed a Notice of Bankruptcy Filing and Imposition of Automatic Stay.

<sup>1</sup> The clerk entered a default against defendant Nevada Association Servicers, Inc. on February 23, 2017. (Doc. No. 22). Ditech and Dorado Homeowners Association are in the process of finalizing a settlement of Ditech's claims against Dorado.

1           3.       As described in the notice, on February 11, 2019, Ditech Holding Corporation (f/k/a  
2 Walter Investment Management Corp.) and its debtor affiliates, as debtors and debtors in possession,  
3 each commenced a voluntary case under chapter 11 of title 11 of the Bankruptcy Code in the United  
4 States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”). The  
5 Chapter 11 Cases are being jointly administered under Case No. 19-10412 (JLG).

6           4.       It is possible Defendant's affirmative defenses could be construed as a claim against  
7 Ditech, that continuing the litigation may raise claims against Ditech, and that the claims asserted  
8 herein call for equitable remedies declaring the parties' respective interests in the subject real  
9 property in connection with a challenged foreclosure.

10          5.       In an abundance of caution, and to ensure compliance with the bankruptcy court's  
11 automatic stay and that no party is prejudiced by continuing the prosecute this matter, Ditech is  
12 seeking further direction from the bankruptcy court on whether it can proceed with this action.

13          6.       The Parties stipulate the dispositive motion deadline, currently set for March 7, 2019  
14 (ECF No. 55) will be re-set after the bankruptcy court issues an order lifting the stay and/or  
15 confirming no stay is in effect for this action.

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7. The Parties will file a joint status report on or before April 9, 2019, advising the court of the status of the bankruptcy court's automatic stay and setting a deadline for dispositive motions as applicable (assuming the stay issue is resolved).

DATED this 7th day of March, 2019.

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<i>Attorneys for Plaintiff Ditech Financial LLC</i>	<i>Attorneys for Las Vegas Development Group, LLC &amp; Thunder Properties, Inc.</i>

**ORDER**

**IT IS SO ORDERED:**



**UNITED STATES DISTRICT COURT JUDGE**

DATED: March 11, 2019